

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

This document applies to:

ETHICON ELECTION WAVE (PTO 298)
CASES LISTED IN PLAINTIFFS' NOTICE
OF ADOPTION AT EXHIBIT A (Doc.
7294)

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF WAVE 3 DAUBERT
RESPONSE REGARDING SALIL KHANDWALA, M.D.,
FOR ELECTION WAVE (PTO 298)**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Salil Khandwala, M.D., in the Election Wave (PTO 298) cases identified in Exhibit A to their Notice. *See* Doc. 7294. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Salil Khandwala, M.D. for Ethicon Wave 3 (Doc. 2925) as their response for the Election Wave. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
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